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IN THE UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

PAULA WHITE-HARRIS,)	
Plaintiff,)	Case No: 2:15-cv-01340-JAD-NJK
)	
v.)	
)	
CAROLYN W. COLVIN, Acting)	
Commissioner of Social Security,)	
)	
Defendant(s))	
_____)	

**STIPULATION AND ORDER FOR EXTENSION OF
30 DAYS FOR PLAINTIFF TO FILE FOR SUMMARY JUDGMENT**

Plaintiff **PAULA WHITE-HARRIS** ("Plaintiff"), by her attorney **NEIL H GOOD**, moves for a first 30-day extension of time from December 13, 2015 to January 13, 2016, to file the Motion for Summary Judgment in this matter.

1. On November 3, 2015, Magistrate Judge Nancy J. Koppe issued a Scheduling Order in this matter, which ordered Plaintiff, in pertinent part, to file and serve a motion for summary judgment and/or remand within thirty (30) days from the date defendant Commissioner of Social Security ("Commissioner") served Plaintiff with a copy of the administrative record.

2. On November 4, 2015 Defendant filed with the Court a Notice of Manual Filing Social Security Administrative Record manually filed with the Magistrate Judge's Chambers in this matter.

3. On December 11, 2015, both Mark Wolff of the United States Attorney's Office and Esther Kim of the Office of the General Counsel for the Social Security Administration agreed to a 30 day extension for Plaintiff to file her Motion for Summary Judgement.

4. Plaintiff requests a first extension of 30 days to file the motion for summary judgment in this matter. The reason for the request is Plaintiff's Counsel did not receive the Administrative Record timely. The record arrived late due the fact that the office located at 6655 W. Sahara Ave, is closed and is only a forwarding address. The Motion for Summary Judgment is not complete.

WHEREFORE, Acting Attorney Neil H. Good requests that the court grant a thirty (30) day extension of the deadline for Representative to file and serve his Motion for Summary Judgment and/or remand, and that the time for Defendant to file either a notice of voluntary remand of the case or points and authorities in opposition to Plaintiff's motion be extended until February 13, 2016.

I declare under penalty of perjury that the forgoing is true and correct.

Executed: 12/11/15

Respectfully submitted,

/s/ NEIL H. GOOD

NEIL H. GOOD

Attorney for Plaintiff

ORDER

Pursuant to the parties' stipulation, the Court hereby **EXTENDS** the schedule in this matter as follows:

1. The deadline for the filing of Plaintiff's Motion for Summary Judgment and/or Remand is extended thirty (30) days to January 13, 2016; and
2. The deadline for Defendant to file either a notice of voluntary remand of the case or points and authorities in opposition to Plaintiff's motion be extended until February 13, 2016.

IT IS ORDERED.

Dated: December 11, 2015



NANCY J. KOPPE
UNITED STATES MAGISTRATE JUDGE